

Law Office Of

Joaquin Perez

6780 Coral Way • Miami, Florida 33155
Phone (305) 261-4000 • Fax (305) 662-4067
jplaw1@bellsouth.net
(Also admitted in Massachusetts and Rhode Island)

Via ECF

June 1, 2021

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Fredy Renan Najera Montoya*
15-cr-378 (PGG-1)

MEMO ENDORSED:

The sentencing scheduled for June 11,
2021 is adjourned to **Monday, July
12, 2021 at 3:00 p.m.**

SO ORDERED.



Paul G. Gardephe
United States District Judge
Dated: June 2, 2021

Dear Judge Gardephe:

Defendant Freddy Najera Montoya moves this court for a thirty (30) day adjournment of the sentencing date currently scheduled for June 10, 2021. Mr. Najera would respectfully advise this Honorable Court that there are a number of different matters awaiting this Court's ruling. More specifically, on November 2, 2020, Defendant filed a motion for Disclosure of Brady material. (Dkt. 151). On November 4, 2020, the Government filed a response to Defendant's motion (Dkt. 153). Mr. Najera filed a reply on November 23, 2020 (Dkt. 154). No ruling has been made on the issues raised in the pleading.

More recently on December 23, 2020. Defendant filed an initial objection to the PSR, (Dkt. 154,155). On December 23, 2020 Government submitted a response and sentencing submission (Dkt.156). Today Defendant is filing an additional objections and clarification to the Presentence Investigation Report and is awaiting the Probation Department's response as required under Fed. R. Crim. P. 32(F)(3) and 32 (g). Given the Government's request for a life sentence and the scope of the matters in dispute, Defendant is requesting this Court afford him an adequate amount of time to prepare and comment upon the probation office's determination and to speak on Defendant's behalf at sentencing.

Respectfully submitted,

/s/ Joaquin Perez /

JOAQUIN PEREZ, ESQ.

NYB: 52376532

6790 Coral Way

Miami, Florida 33155

Tel. (305) 261- 4000

jplaw1@bellsouth.net

cc: Emil J. Bove, III, AUSA
(Via ECF)